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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 DARTAGNON TABOR,

14 Plaintiff,

15 v.

16 KILOLO KIJAKAZI,
17 Acting Commissioner of Social Security,

18 Defendant.

No. 2:22-cv-01249-JDP

STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

19
20 IT IS HEREBY STIPULATED, by and between the parties through their respective
21 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
22 Motion for Summary Judgment be extended days thirty-five days (35) days from January 5, 2023
23 to February 9, 2023. This is Defendant's first request for an extension. Plaintiff has no objection
24 to Defendant's request for an extension.

25 Good cause exists for this request. Defendant respectfully requests this additional time
26 because Counsel for Defendant has been unable to devote the time required to complete
27 Defendant's response to Plaintiff's Motion for Summary Judgment given the current due date.
28

Counsel has been out of the office since December 23, 2022 on vacation visiting family and was to return home on January 4, 2023. Due to the storm hitting San Francisco and ensuing flight cancellations, Counsel will not return to the office until January 6, 2023. Given this current situation and competing workload requirements an extension until February 9, 2023 should provide an opportunity for the undersigned Counsel for Defendant to complete the response to Plaintiff's Motion for Summary Judgment. Furthermore, a reassignment of this matter to another staff attorney is currently not tenable given the high volume of cases that all of our limited staff (due to leave and resignations) is handling. Counsel apologizes to the Court for any inconvenience caused by this delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

DATE: January 5, 2023

By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorneys for Defendant

Respectfully submitted,

Attorneys for Plaintiff

DATE: January 5, 2023

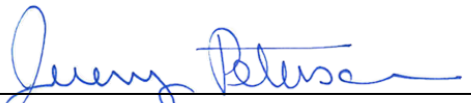
By: s/ Jennifer L. Dunn *
Jennifer L. Dunn
Coveney Law, LLC
(*as authorized by email)

ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including February 9, 2023, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: January 5, 2023



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE